

**United States District an Bankruptcy Courts
For the District of Columbia**

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Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia

Sallah Hamamin Abdulla

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Case: 1:12-cv-01705

Assigned To : Collyer, Rosemary M.

Assign. Date : 10/18/2012

Description: Pro Se Gen. Civil

vs.

University of Arkansas at Little Rock

2801 S. University avenue

Little Rock, AR. 72204

Complaint

The basis for jurisdiction of this civil action which I brought is the diversity of citizenship for which I demand no jury trial at this moment. I (the plaintiff) am an Iraqi citizen who entered United States in December/2008 on F1-visa. The defendant is an educational agency located in Little Rock, Arkansas.

The events giving rise to this action occurred between early Feb/2010 and May 10, 2010. Most of the events took place in Washington, DC and some of them in Little Rock, AR.

When I was attending the University of Arkansas at Little Rock during my third

semester as a graduate student on a scholarship contract with the embassy of my home country, I received a call from embassy on April 15, 2010. They told me that they have been notified by the defendant (University of Arkansas) that I have been academically dismissed of their program and so the embassy has made its decision to terminate my scholarship contract. As an attempt to convince the embassy that I am in a good academic standing, I received official transcripts on April 20, 2010 which clearly states my academic standing being good. They called me back on May 11, 2010 telling me that their decision is final because they have received an official letter from a top official in the University of Arkansas confirming the dismissal.

Such behaviour in which the defendant was engaged seriously damaged my professional and academic character through their intentional defamation that they did in their letter that was issued to the embassy by Patrick Pellicane on May 10, 2010 (a copy of which is enclosed with this complaint).

I did not have any idea about the contents of that letter until October 24, 2010 after I seriously requested the head of my department for a copy of the letter. The letter alleges that I had been dismissed from the school since Feb 12, 2010 while the official transcript (a copy of which is attached) issued after 2 months and 8 days after the alleged dismissal date, does not say anything about academic dismissal. Thus the alleged academic dismissal mentioned in the letter by the dean of graduate study, Patrick Pellicane, was far away from truth. Another letter

That I have enclosed with this complaint which was by the head of Applied science department, Haydar Al-Shukri, suggests that the defendant was probably engaged in a conspiracy with possibly one or more individuals in the embassy of my home country to arrange such defamation and the devastation of my life.

As a result of this defamation, I sustained injuries both physical and psychological. I went to jail for 11 days because of the termination of my F1-visa status that was the consequence of revoking my scholarship and the loss of funds. I sustained very serious emotional distress which was later led to a serious depression, eating disorder, sleeping disorder and obstructive sleep apnea. My depression has been diagnosed by a psychiatrist through consultation. Further, I lost the enjoyment of life. As for physical injury, I have a chronic psoriasis which gets worse under bad psychological conditions and emotional distress.

The relief that I demand in this complaint is:

\$11,000,000.00 for being in jail for eleven days.

\$3,000,000.00 for approximately three years of suffering and the treatment of my depression and obstructive sleep apnea and managing my psoriasis.

As I mentioned above, I lost a scholarship to obtain Ph. D degree. My scholarship was up to \$40,000.00 for tuition and fees each year, \$1,400.00 health insurance, and \$25,400.00 for living expenses. Counting a period 6 years to obtain Ph. D in a typica in United states, I would have $6 \times (40,000.00 + 1,400.00 + 25,400) = 6 \times 66,800.00 = \$400,800.00$.

A property of \$100,000.00 worth has been impounded by the embassy of Iraq which was hold as an obligation for carrying out my scholarship contract.

I lost my job in Iraq where I was employed before coming to United states as of Fe, 2011. I had the salary of monthly \$1,200.00 which makes the whole period upto now: 20 months X 1,200= \$24,000.00.

Total = 11,000,000.00+3,000,000.00 + 400,800.00 + 100,000.00+ 24,000.00
=\$14,524,800.00 (Fourteen million, five hundred twenty four thousand and eight hundred dollars).

I hereby declare under the penalty of perjury that the foregoing is true and correct. Signed this 18th day of October, 2012.

A handwritten signature in black ink, appearing to be 'Sallah Abdulla', with a stylized flourish at the end.

Sallah Abdulla (The plaintiff)

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